

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

JOHN CARFORA, SANDRA PUTNAM, and
JUAN GONZALES, individually and as
representatives of a class of similarly situated
individuals,

Movants,

v.

THE UNIVERSITY OF CHICAGO,

Respondent.

Misc. No. 25-7971

UNDERLYING ACTION PENDING
Carfora v. Tchrs. Ins. & Annuity Ass'n
of Am., No. 1:21-CV-8384-KPF
(S.D.N.Y.).

**MOTION TO COMPEL NON-PARTY THE UNIVERSITY OF CHICAGO'S
COMPLIANCE WITH RULE 45 SUBPOENA *DUCES TECUM***

For the reasons stated in the accompanying memorandum of law, Movants John Carfora, Sandra Putnam, and Juan Gonzales respectfully hereby move this Court pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i) and the United States District Court for the Northern District of Illinois Local Rule 37.2 to compel nonparty the University of Chicago to comply with Plaintiffs' Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, dated February 10, 2025.

Pursuant to Local Rule 37.2, Movants provide the following disclosure statement. Following email and telephone conversations that were made in good faith in an attempt to resolve differences, Movants and Respondents were unable to reach an accord. In addition to multiple email conversations, the following telephonic consultations occurred: On March 26, 2025, attorneys Patrick Kutz and Terrence Scudieri, Jr. on behalf of Movants had a telephone conference with attorneys Eric Mattson and Sudeep Dhanoa on behalf of Respondent. On April 28, 2025,

attorneys Patrick Kutz and Terrence Scudieri, Jr., on behalf of Movants, had another telephone conference with attorneys Eric Mattson and Sudeep Dhanoa on behalf of Respondent.

Respectfully submitted,

Dated: July 14, 2025

By: /s/ Joel D. Rohlf
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*Counsel for Movants Individually & as Representatives
of the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2025, I caused the foregoing to be served on the University of Chicago in accordance with Federal Rule of Civil Procedure 4, or via email with the consent of the University of Chicago.

/s/ Joel D. Rohlf
Joel D. Rohlf